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*Interim Co-Lead Counsel for Plaintiffs and the Proposed Class*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE  
ANTITRUST LITIGATION

Master Docket No. 11-CV-2509-LHK

**STIPULATION AND [PROPOSED]  
ORDER AMENDING CASE SCHEDULE**

THIS DOCUMENT RELATES TO:

ALL ACTIONS

## ALL PARTIES HEREBY STIPULATE AND AGREE:

Pursuant to the Court's July 2, 2012 Order re Case Schedule (Dkt. No. 165), counsel for all parties have conferred and propose the following extensions of the case schedule:

EVENT	CURRENT	PROPOSED
Motion for Class Certification	July 19, 2012	September 17, 2012
Opposition to Motion for Class Certification	August 30, 2012	October 29, 2012
Reply In Support of Class Certification	September 20, 2012	November 26, 2012
Hearing on Motion for Class Certification	October 11, 2012	December 13, 2012 <sup>1</sup>
Fact Discovery Cutoff	November 30, 2012	January 29, 2013
Opening Expert Reports	December 14, 2012	February 12, 2013
Opposition Expert Reports	January 4, 2013	March 5, 2013
Expert Discovery Cutoff	January 25, 2013	March 26, 2013
Dispositive Motions and Daubert Motions	February 7, 2013	April 11, 2013
Oppositions to Dispositive and Daubert Motions		May 10, 2013
Replies to Dispositive and Daubert Motions		May 31, 2013

<sup>1</sup> Plaintiffs' counsel are available on December 20, 2012, but Defendants' counsel are not. Plaintiffs' and Defendants' counsel are available on December 13, 2012.

EVENT	CURRENT	PROPOSED
Hearing on Dispositive Motions and Daubert Motions	March 14, 2013	June 20, 2013
Pretrial Conference	May 15, 2013	July 31, 2013 or August 21, 2013 <sup>2</sup>
Jury Trial Begins	June 10, 2013	August 27, 2013 or November 11, 2013 <sup>3</sup>

## IT IS HEREBY STIPULATED:

Dated: July 9, 2012

LIEFF CABRASER HEIMANN &amp; BERNSTEIN, LLP

By: /s/ Kelly M. Dermody  
 Kelly M. Dermody

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<sup>2</sup> The parties have agreed to the revised schedule with the exception of the trial date (*see* n.3). The pre-trial conference dates reflect these separate proposed trial dates.

<sup>3</sup> Plaintiffs request a November 11, 2013 trial date in order to accommodate a pre-existing conflict that several of Plaintiffs' Counsel have with another trial set to commence on September 9, 2013 and run through early October 2013 in *In re Titanium Dioxide Antitrust Litigation*, No. 10-CV-00318 (RDB) (D. Md.). Present Interim Co-Lead Counsel Lieff Cabraser Heimann & Bernstein, LLP and Joseph Saveri of the Joseph Saveri Law firm are also Interim Co-Lead Counsel in *Titanium Dioxide*, and Mr. Saveri will serve as co-lead trial counsel in *Titanium Dioxide*. The Berger & Montague firm, Plaintiffs' co-counsel here, are also Court-appointed Executive Committee members in the *Titanium Dioxide* case and will be serving on the trial team. The Grant & Eisenhofer, P.A. firm, also serves as Plaintiffs' co-counsel here and on the Executive Committee in *Titanium Dioxide*.

Defendants propose a trial date in August 2013 in light of the Court's order granting a two-month extension and requesting a revised schedule which extends all deadlines correspondingly (Dkt. No. 165).

1  
2 Dated: July 9, 2012

JOSEPH SAVERI LAW FIRM

3 By: /s/ Joseph R. Saveri  
4 Joseph R. Saveri

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*Interim Co-Lead Counsel for Plaintiffs and the Proposed Class*

11 Dated: July 9, 2012

O'MELVENY & MYERS LLP

12 By: /s/ Michael F. Tubach  
13 Michael F. Tubach

14 Attorneys for Defendant Apple Inc.

15 Dated: July 9, 2012

KEKER & VAN NEST LLP

16 By: /s/ Daniel Purcell  
17 Daniel Purcell

18 Attorneys for Defendant Lucasfilm Ltd.

19 Dated: July 9, 2012

JONES DAY

20 By: /s/ David C. Kiernan  
21 David C. Kiernan

22 Attorneys for Defendant Adobe Systems Inc.

23 Dated: July 9, 2012

MAYER BROWN LLP

24 By: /s/ Lee H. Rubin  
25 Lee H. Rubin

26 Attorneys for Defendant Google Inc.

27 Dated: July 9, 2012

BINGHAM McCUTCHEN LLP

28 By: /s/ Frank Hinman  
Frank Hinman

Attorneys for Defendant Intel Corp.

1  
2 Dated: July 9, 2012

JONES DAY

3 By: /s/ Robert A. Mittelstaedt  
4 Robert A. Mittelstaedt

5 Attorneys for Defendant Intuit Inc.

6  
7 Dated: July 9, 2012

COVINGTON & BURLING LLP

8 By: /s/ Emily Johnson Henn  
9 Emily Johnson Henn

10 Attorneys for Defendant Pixar

11  
12 **Filer's Attestation**

13 Pursuant to General Order No. 45, § X(B), I attest under penalty of perjury that concurrence in  
14 the filing of the document has been obtained from all the signatories.

15  
16 Dated: July 9, 2012

/s/ Dean M. Harvey  
Dean M. Harvey

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: \_\_\_\_\_. 2012

By: \_\_\_\_\_

Honorable Lucy H. Koh  
United States District Judge